

**16 - 762 BPG**

**AFFIDAVIT IN SUPPORT OF APPLICATION  
FOR A SEARCH WARRANT FOR US MAIL PARCELS**

FILED \_\_\_\_\_ ENTERED \_\_\_\_\_  
LOGGED \_\_\_\_\_ RECEIVED \_\_\_\_\_

APR 12 2016

Your Affiant, Min Hur, United States Postal Inspector, Baltimore, MD, being

duly sworn, hereby deposes and states as follows:

AT BALTIMORE  
CLERK, U.S. DISTRICT COURT  
DISTRICT OF MARYLAND  
BY  DEPUTY

**I. Subject Parcels.**

1. This is an Affidavit submitted in support of an Application for a Search Warrant for six (6) subject U.S. Mail Parcels (each a "Subject Parcel" and, together, the "Subject Parcels"). The Subject Parcels are currently located at the Incoming Mail Facility, in Linthicum Heights, Maryland, and are specifically identified as follows:

<b>Subject Parcel</b>	<b>Express (E) or Priority (P) and Tracking ID number</b>	<b>From: Name and Address</b>	<b>To: Name and Address</b>
1.	(E) EL 291 724 792 US	Angel Padilla PO Box 1970 Elkton, MD 21922	Lourdes Keimara Calle Brazil 29-A Com La dolore, RG PR 00745
2.	(E) EL 066 232 481 US	600 Independence Ave. Wash DC	Scarlett Lundquist 1921 Corporate Center Cir Suite 3D Longmont, CO 80501
3.	(E) EK 927 990 878 US	Alice Ritter 9317 Caroline Ave Silver Spring MD 20901	Steve & Paulina Ritter 1010 E. Avocado Crest La Habra Heights CA 90631
4.	(E) EL 252 487 133 US	Boyd 1220 L ST NW Suite 100-482 Wash, DC 20005	Toni Cole 235 Quince St Unit 205 San Diego CA 92103
5.	(E) EL 019 338 943 US	Lisa Walton 119 Mariners Point Drive Middle River, MD 21220	Nicholas Hogan 771-A 45 <sup>th</sup> Avenue San Francisco CA 94121

6.	(E) EL 273 022 444 US	Steven	Brendan Hofmann PO Box 7011 Tahoe City, CA 96145
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## II. Affiant's Training and Experience

2. I, Min Hur, have been a United States Postal Inspector since June 2015 and have completed 12 weeks of basic investigative training in Potomac, Maryland, which included various aspects of federal law enforcement including the investigation of narcotics-related offenses.

3. As a result of my training and experience, I am aware that Priority Mail Express and Priority Mail services are regularly used by narcotic traffickers to ship controlled substances and bulk cash through the U.S. Mail. The U.S. Postal Service offers Priority Mail Express and Priority Mail as an alternative to First Class Mail (which does not provide a customer with the capability to track the progress of a parcel through the mail system). The weight of the package and the distance traveled are the two main factors in setting the price of a piece of mail sent by Priority Mail Express or Priority Mail. However, Priority Mail Express costs more than Priority Mail. Priority Mail Express is guaranteed (money back) to be delivered on a set date and time, usually overnight. (That deadline is determined at the time of mailing.) The customer receives a receipt with this guaranteed information, and the sender can opt whether or not to require a signature at the receiving end. Customers can track the parcel online by its distinct Priority Mail Express tracking number. Priority Mail, by contrast, has a delivery service standard of 1-3 business days, but delivery within that time period is not guaranteed. Priority Mail is a less expensive alternative to Priority Mail Express, but still provides the ability to track a parcel.

4. Based upon my training and experience in the field of narcotic interdiction through the mails, I know that there are suspicious characteristics common to many packages that contain narcotics, controlled substances or the proceeds thereof (*i.e.*, U.S. currency). These factors, more fully detailed below, are used to identify packages requiring further investigation. In the case of this search warrant, several of these factors were identified with respect to each Subject Parcel, and each Subject Parcel was alerted to by the drug detection canine. The most common factors or suspicious characteristics routinely observed in the course of screening packages are as follows:

a. *Contrasts observed between legitimate business parcels and drug parcels:*

Legitimate businesses using Priority Mail Express typically have a business or corporate account visible on the mailing label, which covers the cost of the mailing. In contrast, the drug distributor will pay for the cost of mailing the package at the counter by using cash or a credit card. Business Priority Mail Express parcels typically weigh no more than 8 ounces, and business Priority Mail parcels typically weigh no more than 2 pounds. Drug packages typically exceed these weights. Address labels on business parcels are typically typed, whereas those on drug packages are typically hand written. In your affiant's experience, it is fairly easy to separate out smaller parcels, which constitute 70% to 80% of all Priority Mail Express and Priority Mail parcels, from other, heavier parcels. Typically, drug traffickers use Priority Mail Express, and will opt out of the requirement of obtaining a signature upon delivery.

b. *Invalid Sender/Return Address:* When drugs are shipped through the mail, the senders generally do not want them back. To distance themselves from parcels containing drugs, often the return addresses and the names of senders are fictitious or false. A fictitious or false address is anything from an incorrect zip code, to a non-existent house number

or street. The name of the sender is also typically invalid in one of several ways. Your affiant has seen packages sent by persons with names of celebrities, cartoon characters, or fictional names. More often a search of a law enforcement database reflects that there is no association between the name of the sender and the address provided.

c. *Invalid Recipient/Address:* It would be counter-productive to put the wrong receiving address on a package, but often the named recipient is not actually associated with the receiving address. This allows the person receiving the package to claim that they did not know about its contents. Sometimes drug packages are addressed to vacant properties with the expectation that the postal carrier will just leave it at the address. The intended recipient will then retrieve it from that location and hope to remain anonymous.

d. *Location of Recipient:* The fact that a package was going to narcotics source states such as Arizona, California, Texas, Washington, Colorado, Puerto Rico and Florida (among others) can also indicate that the parcel contains proceeds of controlled substances.

e. *Smell:* The odor of cocaine, marijuana, and methamphetamine are distinct, and through experience postal inspectors are familiar with these odors. On occasion, a parcel will emit an odor that is easily recognized without the assistance of a canine. Other smells that suggest that a parcel may contain narcotics include the aroma of masking agents. Common masking agents used in an attempt to thwart detection by law enforcement and canines typically include dryer sheets, coffee, mustard, and any other substance that releases a strong smell.

f. *Heavy Taping:* Heavily taped parcels are another factor that will suggest a drug parcel, because narcotics parcels are heavily taped in an effort to keep the smell inside and to forestall easy checking on the interior contents by lifting up a flap. For this reason, your affiant has also observed excessive glue on the flaps of narcotics parcels as well.

g. *Click-N-Ship*: The U.S. Postal Service created Click-N-Ship as a service for frequent mailers and businesses who prefer printing address labels and purchasing postage from their residence or business. Drug traffickers create Click-N-Ship accounts as a means of giving a legitimate appearance to their drug mailings. They create the accounts using fictitious account information and often provide pre-paid credit cards as a means of payment, which are difficult to track. Drug traffickers often use legitimate business return addresses in states other than California and Arizona as a means to deter detection, as these other states are not usually considered "source" states for controlled substances. The postage labels are printed/typed, unlike the typical drug related mailing label which is handwritten.

4. It is your affiant's experience that when these factors are observed, a drug detection K-9 will likely "alert," next to the parcel, indicating that the dog has detected the presence of narcotics. As a result, these factors become a reliable way to profile the parcels being shipped every day.

5. The facts contained in this affidavit are based on my personal knowledge as well as that of the other agents involved in this investigation. All observations that were not made personally by me were related to me by persons with knowledge. This affidavit contains that information necessary to establish probable cause to support an application for a search warrant. This affidavit is not intended to include each and every fact and matter observed by or made known to agents of the government.

### **III. Probable Cause**

6. The following factors or suspicious characteristics are present in each of the subject parcels:

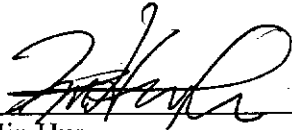
<b><i>Subject Parcel Express or Priority</i></b>	<b><i>Going to Source State/ Country:</i></b>	<b><i>Weight:</i></b>	<b><i>Label:</i></b>	<b><i>Senders name associated with address? Yes / No</i></b>	<b><i>Recipients name associated with address? Yes / No</i></b>	<b><i>Canine Alert?</i></b>
1. Express	Yes - PR	4.10 ozs	Handwritten	No	No	Yes - Cody
2. Express	Yes – CO	1 lb 10.2 oz	Handwritten	Unknown	Yes	Yes – Cody
3. Express	Yes – CA	2 lbs 7.6 ozs	Handwritten	No	Yes	Yes – Cody
4. Express	Yes – CA	2 lbs 9 ozs	Handwritten	Yes	No	Yes – Cody
5. Express	Yes – CA	2 lb 1 oz	Handwritten	Yes	Yes	Yes – Cody
6. Express	Yes – CA	1 lb 7.1 ozs	Handwritten	Unknown	Yes	Yes – Cody

7. The suspicious characteristics listed above were identified while the Subject Parcel was in the mail stream. Therefore, on March 28, 2016, each Subject Parcel listed above was individually removed from the mail stream. At that point, law enforcement used standard protocol for canine detection to determine whether there was probable cause that the Subject Parcel contained narcotics. Specifically, after being removed from the mail stream, each Subject Parcel was individually placed by a wheel well of a vehicle at the Incoming Mail Facility, Linthicum Heights, Maryland. At that time, a narcotic detecting canine named “Cody” was brought forward to scan around the vehicle. The handler observed the canine and then informed agents whether the dog alerted on each of the individual Subject Parcels. The canine handler for “Cody” is Baltimore City Police Officer George Vigue. “Cody” was last certified in September 2015 and is trained on the odor of cocaine, heroin, black tar heroin, marijuana, and MDMA. Additionally, “Cody” receives monthly recurrent narcotics odor detecting training. This process was repeated for each and every Subject Parcel listed above. As indicated in the chart, the drug detection dog alerted to the presence of narcotics for each of the six (6) Subject Parcels.


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**IV. Conclusion**

8. Your affiant submits that based upon the above indicators, my training and experience, and the alert of a trained canine on each package, there is probable cause that each of the six (6) above-described Subject Parcels contains narcotics or controlled substances, or the proceeds thereof (*i.e.*, U.S. currency) and/or materials relating to the distribution of controlled substances through the United States Mail.

  
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Min Hur  
United States Postal Inspector

Subscribed and sworn to before me this 19<sup>th</sup> day of March, 2016.

  
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The Honorable Beth P. Gesner  
United States Magistrate Judge

## ATTACHMENT A

## DESCRIPTION OF PARCELS TO BE SEARCHED

<b><i>Subject Parcel</i></b>	<b><i>Express (E) or Priority (P) and Tracking ID number</i></b>	<b><i>From: Name and Address</i></b>	<b><i>To: Name and Address</i></b>
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